

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

LEGEND'S CREEK LLC,
JON RESTIVO, and
ADEN MOTT

Plaintiffs

v.

C.A. No. 22-cv-309-JJM-PAS

THE STATE OF RHODE ISLAND, and
THE RHODE ISLAND DEPARTMENT OF
HEALTH

Defendants

DEFENDANTS SUPPLEMENTAL STATEMENT OF UNDISPUTED FACTS

Defendant, the State of Rhode Island Department of Health (“Defendant” or “RIDOH”), supplement the following undisputed facts in support of their Objection to Plaintiff’s Motion for Summary Judgment.

66. Carlene Newman testified that RIDOH had reached out to the Rhode Island Department of Environmental Management (“RIDEM”) regarding any information RIDEM had on Wrights Salvage Yard. In response, RIDEM had very little information on the Salvage Yard. There was a self-compliance checklist done by the Salvage Yard, there was an indication of “storing stuff improperly” and some licensing issues. *See excerpt of Carlene Newman deposition transcript*, attached as Exhibit P (“Exh. P”) at p. 38 lines 6-25; p. 39 lines 1-11.

Respectfully submitted,

THE STATE OF RHODE ISLAND
and THE RHODE ISLAND
DEPARTMENT OF HEALTH

By:

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ATTORNEY GENERAL

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CERTIFICATION

I, the undersigned, hereby certify that I have filed the within Document via the ECF System and that it is available for viewing and downloading on the 4th day of November, 2024.

/s/ Shannon L. Haibon